

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SYED IQBAL RAZA, M.D.,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	NO. 06-132 (JJF)
	:	
SIEMENS MEDICAL SOLUTIONS USA, INC.,	:	
SIEMENS MEDICAL SOLUTIONS HEALTH	:	
SERVICES CORP., SIEMENS CORPORATION	:	
and SIEMENS AG,	:	
	:	
Defendants.	:	

**DEFENDANT SIEMENS AG'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT**

For the reasons expressed in its accompanying Opening Brief, Defendant Siemens AG, by and through its undersigned counsel Pepper Hamilton LLP, hereby moves this Court pursuant to Rule 12(b)(5) and Rule 12(b)(2) of the Federal Rules of Civil Procedure, for an Order dismissing Plaintiff's Complaint against it with prejudice.

Respectfully submitted,

OF COUNSEL:

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Dated: May 2, 2006

Attorneys for Defendant Siemens AG

CERTIFICATE OF SERVICE

I, Phillip T. Mellet, hereby certify that on this 2nd day of May, 2006, I caused to be served the foregoing Defendant Siemens AG's Motion to Dismiss Plaintiff's Complaint and Proposed Order *via* CM/ECF upon the following:

Martin S. Lessner, Esquire
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/s/ Phillip T. Mellet
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and SIEMENS AG,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this ____ day of ____, 2006, upon consideration of Defendant Siemens AG's Motion to Dismiss Plaintiff's Complaint, and Plaintiff's response thereto, it is hereby ORDERED that Defendant's Motion is GRANTED and Plaintiff's Complaint against Siemens AG is dismissed with prejudice.

BY THE COURT:

Joseph J. Farnan, Jr.
U.S. District Judge